

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF PENNSYLVANIA

-----X
:
IN THE MATTER OF THE :
EXTRADITION OF :
SHAWN GREGORY TOWNER :
:
:
-----X

FILED UNDER SEAL

17-~~1024~~- M

COMPLAINT
(18 U.S.C. §3184)

I, Michelle Rotella, the undersigned Assistant United States Attorney, being duly sworn, state on information and belief that the following is true and correct:

1. In this matter, I represent the United States in fulfilling its treaty obligation to the Government of the Republic of Ireland ("Ireland").
2. There is an extradition treaty in force between the United States and the Republic of Ireland, the Treaty on Extradition Between the United States of America and Ireland, U.S.-Ir., July 13, 1983, T.I.A.S. No. 10813, and the Instrument as contemplated by Article 3(2) of the Agreement on Extradition between the United States of America and the European Union signed 25 June 2003, as to the application of the Treaty on Extradition between the United States of America and Ireland ("Instrument"). The Instrument (with Annex) reflects the integrated text of the provisions of the Treaty and the U.S.-EU Extradition Agreement (hereinafter collectively referred to as the "Treaty").
3. Pursuant to the Treaty, the Government of Ireland has submitted a formal request through diplomatic channels for the extradition of Shawn Gregory Towner ("Towner").
4. According to the information provided by the Government of Ireland, Irish authorities

charged Towner with possession of child pornography, in violation Section 6(1) of the Child Trafficking and Pornography Act of 1998.

5. This offense was committed within the jurisdiction of Ireland. A warrant for Towner's arrest for the offense of possession of child pornography was issued on September 13, 2016, by a Judge of the District Court of Dublin.

6. The warrant was issued on the basis of the following facts: On March 30, 2006, a confidential informant, regarded as a reliable source by Irish police, informed police that Towner possessed images of child pornography. Specifically, the informant stated that he or she had viewed a compact disk ("CD") in Towner's possession and observed images of child pornography on that disk.

Thereafter, also on March 30, 2006, police obtained a judicially-authorized search warrant to search Towner's residence at 14 Ellesmere, Brewery Road, Stillorgan, Dublin, Ireland for evidence of child pornography. Later the same evening, police executed the search warrant on Towner's residence. Upon entry, police observed Towner lying on his bed with a laptop computer, on which he was watching adult pornography. Police also observed a number of bags in the residence. Towner admitted that these bags belonged to him.

When asked by the lead investigating officer whether he was in possession of material in violation of Irish child pornography laws, Towner admitted that he was and that such material was in one of his bags. Then, police arrested Towner and seized the property inside of those bags, as well as Towner's laptop computer. Police transported Towner to the Blackrock Garda police station.

There, during his subsequent interrogation, Towner further admitted to having downloaded and viewed images of child pornography involving children under the age of

sixteen; he also confessed that such images were on his computer and on a CD in his possession. Pursuant to the Child Trafficking and Pornography Act of 1998, Irish law defines a child as a person under the age of seventeen years.

Police showed Towner five movies that had been found on a CD seized at his residence, which showed female children, believed to be approximately six to eight years of age engaged in sexual intercourse with adult men. These five movies were titled "Vicki String Bikini;" "Vicki and Janice;" "Vicki Cum Choke;" "V/Pigtails;" and "Sex Experiences." Towner recognized these five movies and confessed to downloading and viewing them, while knowing that it was wrong to possess child pornography.

Police also showed Towner, among other things, five images also found on a CD seized at his residence, which police believed to show underage girls engaging in sexual activity and/or exposing their genitalia. The first of these images was entitled "15 year old slut sister loves to show me her shaved hairless," which Towner admitted to downloading but claimed to believe depicted a female older than fifteen years of age. Three other images were entitled "My stepdaughter will be 14 years old this week Teen Lo." Towner admitted to downloading these three images. The fifth image was entitled "4 Young teen girls topless on webcam 13, 14, 15, 16 underage A." Towner recognized this image and stated that he had probably downloaded it.

Police later located at least three other images of child pornography among the materials seized from Towner's residence.

Towner explained that he started downloading child pornography in January 2006 via the peer-to-peer file sharing program, LimeWire. He would then store the images on CDs. Towner further admitted to using search terms such as "teens sex" when browsing the Internet, and that he would find child pornography associated with such search terms.

end that the evidence of criminality may be heard and considered and that this complaint and the warrant be placed under the seal of the Court until such time as the warrant is executed.

LOUIS D. LAPPEN
Acting United States Attorney



Michelle Rotella
Assistant United States Attorney

Sworn to before me
and subscribed in my presence
this 2nd day of August, 2017,
at 9:55 a.m.



MARILYN HEFFLEY
UNITED STATES MAGISTRATE JUDGE